## Case 12-13703-JDW Doc 53 Filed 12/11/14 Entered 12/11/14 15:55:20 Desc Main

## Document Page 1 of 1 UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF MISSISSIPPI

IN RE: CANDY D. WILSON CHAPTER 13

DEBTOR CASE NO. 12-13703 JDW

## RESPONSE TO TRUSTEE'S MOTION TO DISMISS [DOCUMENT NO. 51]

COMES NOW, Candy D. Wilson, by and through her attorney of record and in response to the Trustee's Motion To Dismiss and would show as follows:

Debtor respectfully requests her case not be dismissed. Debtor is in the process of modifying her plan to surrender the mobile home. After that motion is heard, she requests that her wage order be amended and any arrearage be added back into her plan.

WHEREFORE, PREMISES CONSIDERED, Debtor prays, upon a hearing hereon, this Court deny Trustee's Motion To Dismiss. Debtor prays also for such other relief, general or specific, to which she may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Karen B. Schneller
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## **CERTIFICATE OF SERVICE**

I, Karen B. Schneller/Robert H. Lomenick, Attorney for Debtors, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Response To Motion To Dismiss to the Debtors, either by electronic means or by United States Mail to the following: .

Locke Barkley Chapter 13 Trustee 6360 I 55 North, Suite 140 Jackson, Mississippi 39211

U.S. Trustee 501 East Court Street, Suite 6-430 Jackson, Mississippi 39269

This the 9<sup>th</sup> day of December, 2014.

/s/ Karen B. Schneller KAREN B. SCHNELLER ROBERT H. LOMENICK, JR.